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Attorney for Debtor
Cal Neva Lodge, LLC

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re: Case No. 16-51281-GWZ
CAL NEVA LODGE, LLC, Chapter 11 Case
Debtor.

PAUL AND EVY PAYE, LLC, Adv. No. 17-05040
Plaintiffs,

v. **THIRD STIPULATION AND ORDER
REGARDING EXTENSION OF TIME TO
RESPOND**

CAL NEVA LODGE, LLC, 9898 LAKE,
LLC, and CR LAKE TAHOE, LLC,
DOES 1-20 and ROES 1-20,

Defendants. **Hearing Date: N/A
Hearing Time:**

Plaintiff Paul and Evy Paye, LLC (“Paye”), and Defendants Cal Neva Lodge, LLC
 (“Cal Neva”), 9898 Lake, LLC (“9898”), and CR Lake Tahoe, LLC (“CRLT”) agree as
 follows:

- 1 1. Paye filed this adversary proceeding (“Complaint”), on October 6, 2017.
- 2 2. Each of the Defendants acknowledge having received service of process.
- 3 3. Defendants 9898 and CRLT are not currently represented by counsel.
- 4 4. Defendant Cal Neva owns the membership interest in New Cal-Neva Lodge, LLC
- 5 which, in turn owns the membership interest in Defendant CRLT which, in turn, owns the
- 6 membership interest in Defendant 9898, and is entering into this Stipulation on behalf of
- 7 CRLT and 9898 pending their retention of counsel.
- 8 5. Under applicable rules, Defendants’ obligation to answer or otherwise respond to
- 9 the Complaint was due on Monday, November 13, 2017.
- 10 6. In their first Stipulation for Extension, **DE 55**, the parties agreed to November 28,
- 11 2017, as the time within which Defendants would be required to answer or otherwise
- 12 respond.
- 13 7. In their second Stipulation for Extension, **DE 58**, the parties agreed to December
- 14 14, 2017, as the time within which Defendants would be required to answer or otherwise
- 15 respond.
- 16 8. Based upon the pending global resolution of substantially all issues in the main
- 17 case as well as this adversary proceeding, Plaintiff and Defendants have now agreed to a
- 18 third extension of time within which Defendants, individually, are required to answer or
- 19 otherwise respond to the Complaint. Based upon the foregoing,

20 **IT IS HEREBY STIPULATED AND AGREED** that

21 A. The time within which Defendants are required to answer or otherwise

22 respond to the Complaint is extended to January 14, 2018; and

23 B. This extension does not preclude any request for a further extension.

24 **HARTMAN & HARTMAN**

ESTES LAW, P.C.

25 /S/ Jeffrey L. Hartman

26 Jeffrey L. Hartman, Esq. For

27 Cal Neva Lodge, LLC

/S/ Holly E. Estes

Holly E. Estes, Esq. For

Paul and Evy Paye, LLC

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